

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GERARD TRAVERS, on behalf of himself
and all others similarly situated,

Plaintiff,

-vs.-

FEDEX CORPORATION,

Defendant

Case No. 19-cv-6106-MAK

**UNOPPOSED MOTION FOR ADMISSION PRO HAC VICE
OF PETER ROMER-FRIEDMAN, ESQUIRE**

Plaintiff Gerard Travers, through his undersigned counsel, hereby moves for the admission of Peter Romer-Friedman, Esquire as counsel for the Plaintiff in this matter (“Plaintiff’s Motion”).

In support of Plaintiff’s Motion, Plaintiff states as follows:

1. Undersigned counsel, who will serve as Local Counsel, is admitted to practice and is in good standing before this Court.
2. Undersigned counsel’s appearance has been entered in this case and I confirm my continuing obligations under Section I. (K) of the Court’s Policies and Procedures.
3. Good cause exists for Plaintiff to have the skilled and experienced counsel of his choosing represent him in this matter applying an issue of federal law in his home jurisdiction.
4. Undersigned counsel has been advised by counsel for Defendant, Melissa McCoy Gormly, Esquire, that Defendant does not oppose Plaintiff’s Motion.

In further support of Plaintiff's Motion, Plaintiff refers to and relies upon the attached Memorandum of Law in support, which is incorporated by reference herein.

WHEREFORE, Plaintiff respectfully requests that his Motion be granted and that Peter Romer-Friedman, Esquire be admitted to practice before this Court *pro hac vice* as counsel for Plaintiff in this matter.

Respectfully submitted,

/s/ Adam H. Garner
Adam Harrison Garner (Bar I.D. 320476)
The Garner Firm, Ltd.
1515 Market Street, Suite 1200
Philadelphia, PA 19102
Tel: (215) 645-5955
Fax: (215) 645-5960
adam@garnerltd.com

Attorney for Plaintiff

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I have sought the position of Defendant regarding the foregoing Motion and have been advised by counsel for the Defendant that Defendant does not oppose Plaintiff's Motion.

/s/ Adam H. Garner
Adam Harrison Garner

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion, the Memorandum of Law in Support, and proposed Order, were served on the following counsel for Defendant via the Court's CM/EF system.

Melissa McCoy Gormly, Esquire
Colleen Hitch Wilson, Esquire
Federal Express Corporation
3620 Hacks Cross Road,
Building B, 3rd Floor
Memphis, TN 38125

Tristan Morales, Esquire
O'Melveny & Myers LLP
1625 Eye Street, NW
Washington, DC 20006

Mark Robertson, Esquire
O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036

Attorneys for Defendant

/s/ Adam H. Garner
Adam Harrison Garner